

ORIGINAL DOCKET FILE COPY ORIGINAL

**verizon**

Karen Zacharia  
Vice President and Associate  
General Counsel

RECEIVED

JUL 17 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

1320 North Court House Road,  
8<sup>th</sup> Floor  
Arlington, VA 22201  
(703) 974-4865 (telephone)  
(703) 974-0691 (facsimile)

July 17, 2001

**Erratum**

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
TW-B204  
Washington, D.C. 20554

**Re: Erratum to Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, CC Docket No. 01-138**

Dear Ms. Salas:

This erratum provides revisions to material filed June 21, 2001 with the above captioned section 271 application.

Attachment 43 of the Lacouture/Ruesterholz Declaration provides a comparison of the installation quality performance for Verizon's retail POTS orders requiring a dispatch and CLEC DSL loops under the PR-6-01 metric (% Installation Troubles reported within 30 days). Verizon intended to compare retail and CLEC performance under business rules that have been agreed to by the New York Carrier-to-Carrier Working Group, but the attachment contained two inadvertent errors. First, the retail observations (Verizon POTS dispatch orders) were incorrect, although the retail performance numbers in the original exhibit are correct. Additionally, the CLEC performance results on the original exhibit are the reported Carrier-to-Carrier results instead of the intended new business rule results (which would include troubles from all CLECs). The weighted average for CLECs from February through April under these new rules is 5.91 percent, slightly less than the 5.94 percent contained in the original exhibit. The back-up material included with the original exhibit is correct.

No. of Copies rec'd 014  
List ABCDE

Verizon is also submitting a revised page of the Lacouture/Ruesterholz Declaration and the brief that reflects these changes.

Sincerely,

Karen Zacharia S.E.N.

Enclosures

six-day interval for DSL loops that have been pre-qualified and the nine-day interval for DSL loops where a CLEC requested a manual loop qualification. For example, from February through April, Verizon completed within these respective intervals approximately 97 percent of CLEC orders for pre-qualified DSL loops and more than 99 percent of CLEC orders for DSL loops that required a manual loop qualification. See Lacouture/Ruesterholz Decl. ¶¶ 173-174.

Installation Quality. Verizon provides unbundled DSL-capable loops to competing carriers that are equal in quality to Verizon's retail services.

The measurement that the Commission previously has used to evaluate installation quality is the subset of total trouble reports that are reported within 30 days of installation (so-called "I-codes"). Because virtually all unbundled DSL loop orders require a dispatch, the CLECs in the New York Carrier Working Group recently agreed that the retail analogue for this measurement should include only dispatched retail POTS services, instead of a combination of dispatched and non-dispatched retail POTS services. Verizon's performance under this agreed-upon measurement shows that it is providing better services to CLECs than to itself. See id. ¶ 181; see also Massachusetts Order ¶ 146 (relying on adjusted performance data for this measurement demonstrating parity).<sup>31</sup> From February through April, CLECs had I-codes on 5.91 percent of their DSL loop orders, whereas Verizon's retail POTS customers had I-codes on 6.20 percent of their dispatch orders. See Lacouture/Ruesterholz Decl. ¶ 181. Or, to put it another

---

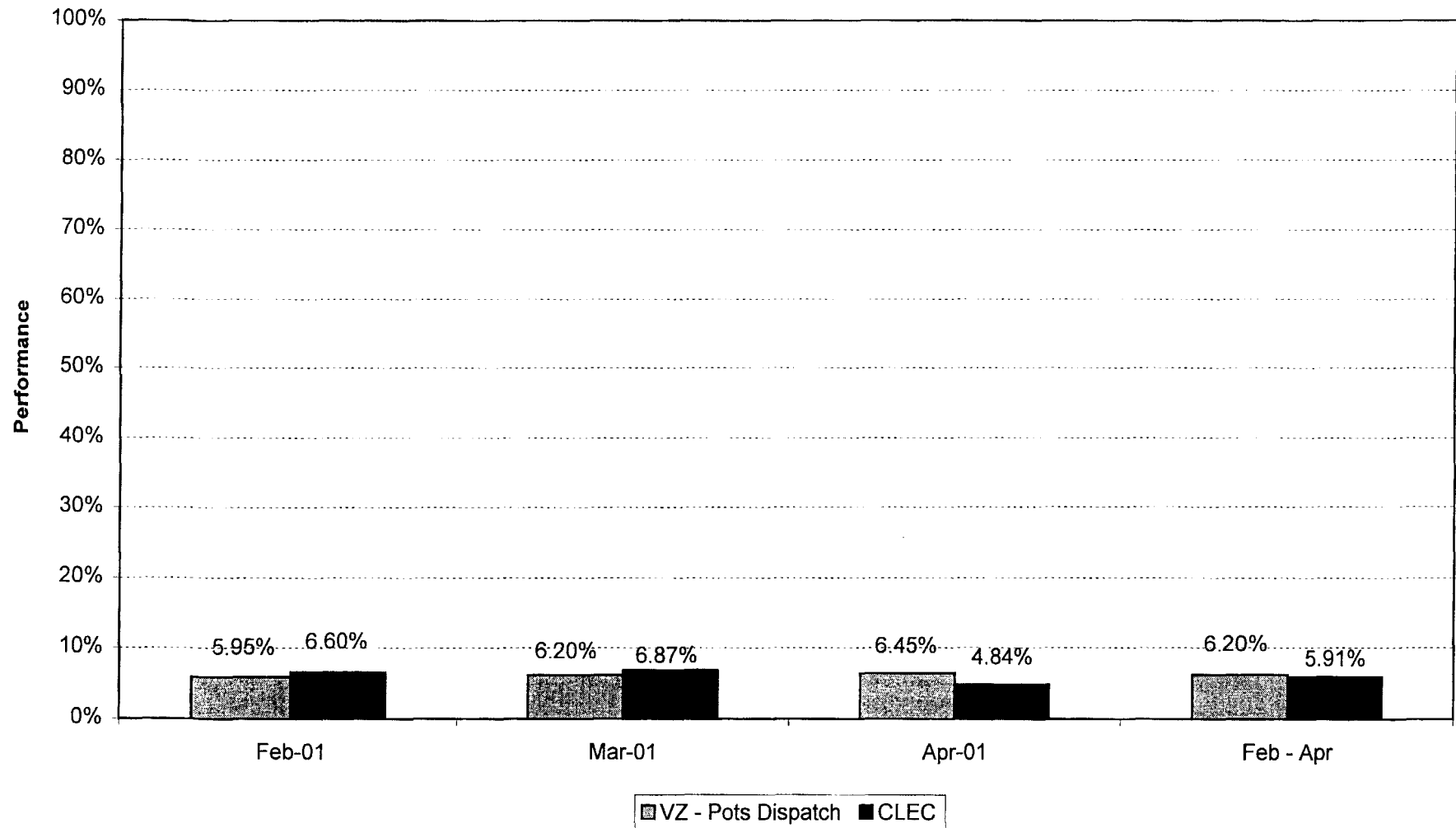
<sup>31</sup> In March 2001, the Carrier Working Group in New York agreed to change this measurement in two ways. *First*, it agreed that I-codes from all carriers would be included in the measure. See Lacouture/Ruesterholz Decl. ¶ 180; Guerard/Canny/DeVito Decl. ¶ 89; see also Massachusetts Order ¶ 144 n.450 (finding this modification provides more accurate results). *Second*, the group changed the retail analogue to retail POTS orders requiring a dispatch (rather than all POTS orders as before). The group agreed to this change since nearly all DSL loop orders require a dispatch and, therefore, should be compared to POTS orders that also require a dispatch. See Lacouture/Ruesterholz Decl. ¶ 180.

(so-called “I-Codes”) – are included in the Carrier-to-Carrier performance reports as Percent Installation Troubles Reported within 30 days (PR-6-01). The I-Code rate was originally intended to measure Verizon’s ability to deliver DSL loops that work, but it does not serve that purpose. It is the CLEC – not Verizon – that tests the loop and determines whether it is working at the time of installation. When Verizon installs a DSL loop, Verizon contacts the CLEC so that the CLEC can test the loop for improper voltages, ringers and load coils. Once this initial testing is complete, Verizon is prepared to “short” the loop temporarily so that the CLEC can test it to verify continuity and length to ensure that it meets the CLEC’s requirements. As a result, the I-Code rate serves as a measure of the accuracy of the acceptance testing performed by the CLEC, rather than a measure of Verizon’s performance.

180. The New York Carrier-to-Carrier Working Group has already determined that PR 6-01 should be revised. First, the New York Carrier-to-Carrier Working Group determined that the appropriate parity comparison should be to dispatched retail POTS services only, instead of a combination of dispatched and non-dispatched retail POTS services. Second, the Carrier Working Group determined that data from all CLECs, whether or not they perform cooperative testing, should be included.

181. Verizon has recalculated the I-Code performance measures in Pennsylvania under the new business rules determined by the New York Carrier-to-Carrier Working Group. During February, March, and April, the I-Code rate on Verizon’s retail POTS orders that required a dispatch was 6.20 percent, compared to 5.91 percent for DSL loops provided to CLECs. *See Attachment 43.* Thus, under the new

**Pennsylvania - DSL**  
**Provisioning - % Installation Troubles Reported within 30 Days (PR-6-01)**  
**Feb - Apr 01**  
**New Business Rules**



**Pennsylvania - DSL**  
**Provisioning - % Installation Troubles Reported within 30 Days (PR-6-01)**  
**Feb - Apr 01**  
**New Business Rules**

**DSL- PR-6-01**

VZ - Pots Dispatch
Performance
Observations

Feb-01    Mar-01    Apr-01    Feb - Apr

5.95%	6.20%	6.45%	6.20%
44403	50163	43509	138075

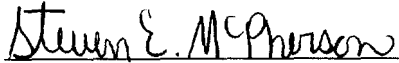
CLEC#
Performance
Observations

6.60%	6.87%	4.84%	5.91%
864	844	1302	3010

# Includes Troubles From All CLECs

CERTIFICATE OF SERVICE

I hereby certify that on this 17<sup>th</sup> of July, 2001, copies of the foregoing "Erratum to Application by Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania" were sent via hand delivery, unless otherwise indicated below, to the parties on the attached list.

  
\_\_\_\_\_  
Steven E. McPherson

\* Via hand delivery.

\*\* Via Federal Express overnight delivery.

Ms. Magalie Roman Salas, Secretary\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Janice Myles\*  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room 5-C237  
Washington, DC 20554

Robert Tanner\*  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 5-C-360  
Washington, DC 20554

Susan Pie\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Cynthia Lewis\*  
U.S. Department of Justice  
1401 H Street, N.W.  
Suite 8000  
Washington, DC 20530

Jeff Prisbery\*  
Department of Justice  
600 E Street, NW  
10<sup>th</sup> Floor  
Washington, DC

ITS\*  
445 12<sup>th</sup> Street, S.W.  
Room CY-314  
Washington, DC 20054

James J. McNulty, Secretary\*\*  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
2<sup>nd</sup> Floor  
Harrisburg, PA 17120